## EXHIBIT 1

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

CUTBERTO VIRAMONTES, et al.

:

Plaintiffs,

Case No. 1:21-cv-04595

v.

.

THE COUNTY OF COOK, et al.

Chief Judge Rebecca R. Pallmeyer

.

Defendants.

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## **DECLARATION OF BRANDON COMBS**

- I, Brandon Combs, make the following declaration pursuant to 28 U.S.C. § 1746:
- 1. I am a citizen of Nevada and am over eighteen years of age. My statements herein are based on personal knowledge and experience.
- 2. I am President of Firearms Policy Coalition, Inc. I have held this position since 2014. In this capacity, I have access to, and personal knowledge of, FPC's membership information and practices.
- 3. FPC is a nonprofit organization incorporated under the laws of Delaware with its principal place of business in Clark County, Nevada. FPC seeks to defend and promote the People's rights—including the right to keep and bear arms—advance individual liberty, and restore freedom. FPC serves its members and the public through legislative advocacy, grassroots advocacy, litigation and legal efforts, research, education, outreach, and other programs.
- 4. FPC has members throughout the United States, some of whom reside in Cook County.
- 5. Plaintiffs Viramontes and Khaya are members of FPC.

- 6. FPC brings this action as a public interest organization on behalf of its individual members in Cook County who are prohibited from possessing the firearms banned by the laws at issue in this case.
- 7. The injuries suffered by these members are germane to the core purposes of FPC.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on April 21, 2023

**Brandon Combs**